



Clint E. Odom  
Director  
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January 17, 2003

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

*Re: Application by Verizon Maryland, Verizon Washington, DC and Verizon West Virginia for Authorization To Provide In-Region, InterLATA Services in States of Maryland, Washington, DC and West Virginia, WC Docket No. 02-384*

Dear Ms. Dortch:

At the request of FCC staff, Verizon is providing copies of handouts used in a meeting with the Department of Justice on January 14, 2003.

Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 02-3511.

Sincerely,

A handwritten signature in black ink, appearing to read "Clint E. Odom".

cc: G. Cohen  
G. Gooke  
V. Schlesinger

Attachments

**Kathy L. Buckley**  
Director  
Regulatory Matters



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Charleston, WV 25314

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FAX 304.344.6123  
[Kathy.L.Buckley@verizon.com](mailto:Kathy.L.Buckley@verizon.com)

February 21, 2001

Sandy Kerns  
Manager, Human Resources  
NTELOS  
Suite 300, 500 Summers Street  
Charleston, WV 25301

Steven Hamula  
Director of Regulatory Affairs  
FiberNet, LLC  
211 Broad Street  
Charleston, WV 25301

Dear Sandy and Steve:

It was nice to meet with you finally to discuss in detail the issue of interLATA extended area service ("EAS") calling. Lunch was delicious, Sandy. You were a gracious host, as I am sure everyone in attendance will agree. Thanks so much.

As we discussed for some hours at the meeting, the issue over provisioning service to competitive local exchange carriers ("CLECs") across LATA boundaries is much more complex than it appears on the surface. In this situation, the CLEC (whether it is NTELOS, FiberNet or another company) wishes to interconnect with the carriers, both incumbent local exchange carriers ("ILECs") and CLECs, that are on the other side of the LATA boundary. As we discussed, it is Verizon WV's view that each carrier has the responsibility to make its own arrangements for the interconnection of its network with the networks of other carriers. That is, it is the CLEC's responsibility, not that of Verizon WV, to make arrangements for the CLEC's interconnection with Ameritech or the other carrier(s) on the opposite side of the LATA boundary.

Verizon WV is willing, however, to try to facilitate interconnection between its CLEC customers and third-party carriers. For example, in situations within LATAs where the CLEC's switch subtends a Verizon tandem, our interconnection agreements typically provide for "transit service" for carrying the CLEC's traffic to the switch of any other carrier that

subtends that same tandem, up to a traffic limit of a DS-1, provided that the CLEC makes reciprocal compensation arrangements with the receiving carrier. On the interLATA EAS routes in question, however, the switch on the other side of the LATA does not subtend our tandem. In fact, the routes in question are from each Verizon WV end office to the end offices of the carrier on the other side of the LATA boundary. Attempting to carry CLEC traffic over those end office to end office routes is a problem, as we explained at our meeting, because Verizon WV has no mechanized way to measure and bill for that CLEC traffic, and because that routing would not be standard practice in accordance with the Local Exchange Routing Guide ("LERG"). Even if such routing were otherwise feasible, the incremental cost of manually handling the billing, measuring and provisioning issues, not only in West Virginia, but across the country, would rule out such routing as a practical solution for our CLEC customers.

Accordingly, we have studied the matter thoroughly to attempt to arrive at a solution that will work for the entire industry, CLECs and ILECs alike. We suggested at our meeting with you that each carrier establish the end office to end office trunks necessary to accomplish the interconnection with the carriers on the other side of the LATA boundary. If, however, CLECs desire our assistance in interconnecting with a carrier on the other side of the LATA boundary, the best solution is for us to provide interstate special access, at tariff-prescribed rates, to the meet point with the ILEC on the other side of the LATA boundary. The interstate special access rates that we quoted at the meeting for DS-1 and DS-0 services are very affordable and have been approved by the FCC.

If you desire to work with us on implementing this solution, please contact your account manager (David Huff for NTELOS and Helen Kaptisan for FiberNet). There remain provisioning issues that we will need to work through, particularly with respect to dealing with the ILEC(s) providing facilities on the other side of the LATA boundary. Also, as we discussed at the meeting NTELOS and FiberNet of course will have to negotiate an interconnection agreement with each ILEC and CLEC with which it wishes to exchange local traffic.

Another option, in the short-term at least, would be for you to purchase a circuit from an interexchange carrier. If you still desire a Verizon-provisioned option to the meet point at the LATA boundary, however, we will be happy to work with you.

Thanks again for meeting with us.

Kathy

cc: Steve Goodman  
John Edwards  
Dannie Walker



# Directory Listing Discussion

January 2003

## **Topics**

- Description of Directory Listings
- Ordering Scenarios
- Billing Account Structure
- Alpha/Numeric Listing Identifiers (ALI Codes)
- Order Processing
- Ordering Systems
- Listing Verification Process
- Assistance Available to CLECs
- Workshops and Training Sessions
- Production Information

- A Directory Listing is a standard listing that includes the name, address, and telephone number of an organization/firm/individual. This listing appears in the Directory Assistance (DA) records and the White Pages Directory for the area in which the telephone service is located.
- Directory Listings can be associated with Resale, UNE Platform, and UNE Loop accounts. Directory Listings are also available to facilities based carriers as standalone listings.
- Each residence main number is entitled to a standard straight line or indented listing in the white pages directory. Each business main number is also entitled to a standard straight line or indented listing in the yellow page directory. Listings are chargeable in accordance with Local Exchange Tariffs and interconnection agreements. Listings may also be included in Directory Assistance.

## Description of Directory Listings





## *Ordering Scenarios*

### **Listings Associated with Platform and Resale Services**

- Verizon supplies the dial tone for platform and resale services and therefore knows what telephone number and directory listings are associated with the service.
- When platform or resold services are disconnected by the CLEC, Verizon also deletes the associated directory listings.

### **Listings Associated with Loops**

- CLECs lease loops from Verizon that are cross connected to CLEC facilities at the collocation site. CLECs supply the dial tone and know what telephone number is associated with that loop. Verizon does not know which listings are associated with which loop.
- CLECs must notify Verizon when to change or remove the directory listing separately from changes or disconnects of loops.

### **Listings Associated with Full Facility Based Services**

- Some CLECs (e.g. cable providers) do not use any Verizon facilities to provide service to an end user. They submit standalone directory listing requests to Verizon.
- Verizon cannot determine when services associated with these directory listings are moved or disconnected, so the service provider must notify Verizon to change or remove the listing.



# Billing Account Structure

## Resale or Platform Accounts

- Directory listings are kept on the same billing account number (BAN) as the associated platform or resold services.

## Loops and Full Facility Based Accounts

- Directory listings associated with loops and full facility based services are put on a special billing number (SBN) used only for directory listings.
- The account numbers have a size limit of approximately 17,500 listings.
- Separate SBN's are created for residence and business listings.
- SBN listing size limit is monitored by Verizon and additional SBNs are created when the remaining available size is approximately 20%. Verizon notifies the CLEC via email that a new SBN has been created and provides directions for its use.

- Alpha/numeric Listings Identifier (ALI) codes are industry standard codes used in combination with the billing account number to uniquely identify directory listings. The code was established by Telcordia, is supported by the Ordering and Billing Forum, and is used by telecommunications companies throughout the industry for both retail and wholesale accounts. The code is 3 to 6 characters in length and appears with a directory listing on the Customer Service Record (CSR).
- ALI codes are used on platform and resale accounts when multiple listings occur on an account.
- When CLECs migrate or create new listings associated with loop or full facility based services, the listings are added to the directory listing SBN and are assigned an ALI code confirmation and billing completion notice for the CLEC to maintain in their database.
- The assigned ALI codes for noncomplex listings are returned to the CLEC on the ALI Code spreadsheet.
- CLECs receive ALI codes for listings associated with Loops and Facility Based Services on the ALI Code spreadsheet.

## **Alpha/Numeric Listing Identifiers (ALI Codes)**



- CLECs should maintain a relationship of directory listing SBN and ALI codes with each other when changing or deleting the directory listing.
- CLECs should maintain a relationship of directory listing SBN and ALI codes with each other directory listing on their database. This will enable them to provide the SBN and ALI code CLECs may request CSRs associated with the services they have requested from Verizon. This will include directory listing information.
- ALI codes are present on the Customer Service Record (CSR) maintained by Verizon.
- SBN containing listings associated with loop and full facility based services can grow to be quite large and cannot be readily retrieved from Verizon by the CLEC.
- Upon request, Verizon will prepare an ALI Code spreadsheet of all the directory listings associated with loop and full facility based services. The SBN and ALI code associated with each of the CLECs listings will be included.

## Managing ALI Codes

# Alpha/Numeric Listing Identifiers (ALI Codes)



## Order Processing

### LSRs and LSOG

- Directory listings (as with all services) are submitted by CLECs on the Local Service Request (LSR) which is the ordering vehicle based on the industry standard Local Service Request Guidelines (LSOG). LSOG is produced by the Ordering and Billing Forum (OBF) which contains representation from LLFCs and CLECs.
- Verizon produces business rules on how to complete the LSR based on LSOG, and modifies and enhances the LSOG as necessary to accommodate new products and to ensure the LSR is completed accurately and produces the result desired by the CLEC.

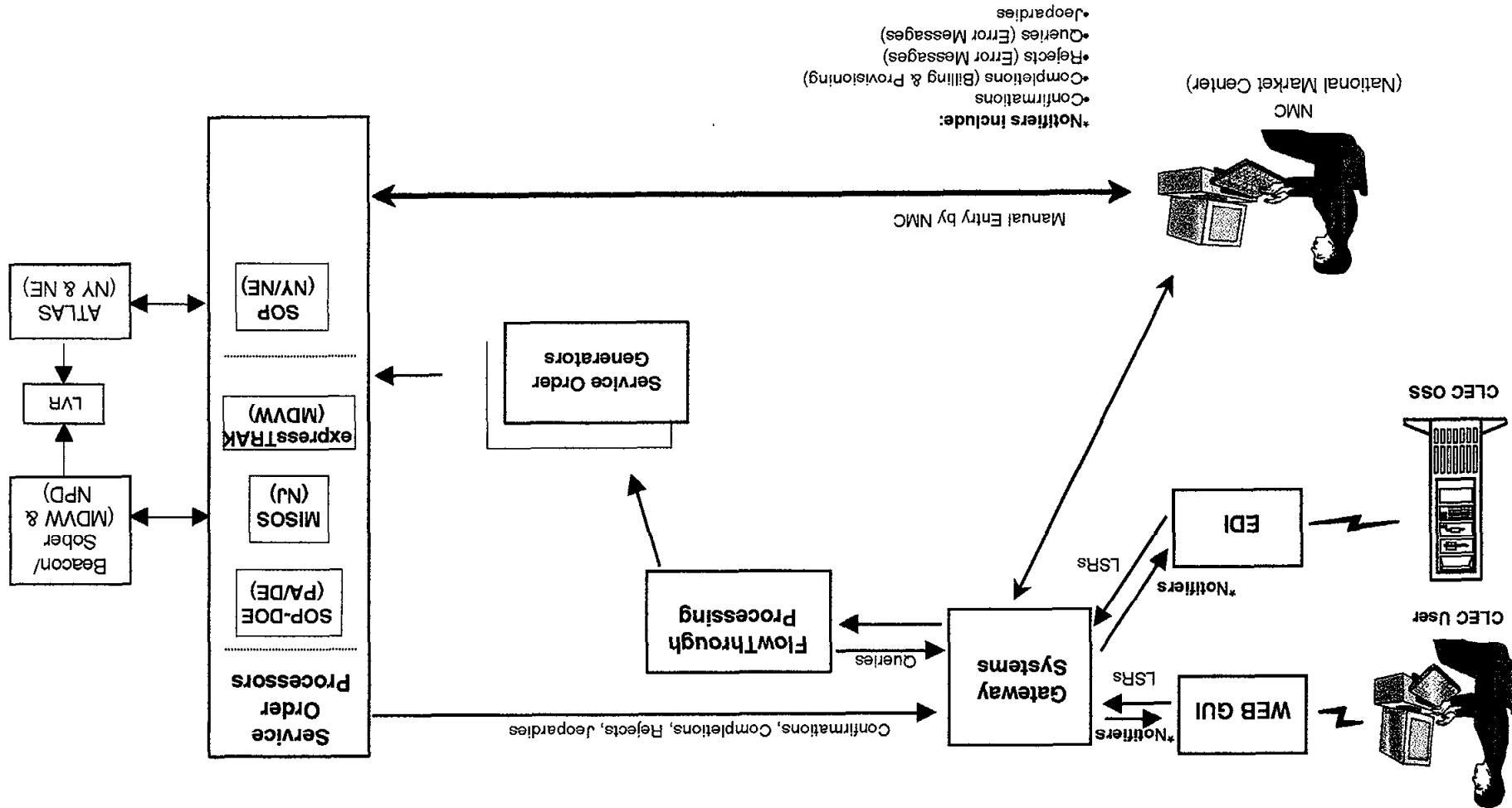
### Directory Listings on Migration

- When a CLEC is migrating a Verizon retail end user, a resale customer, or a platform customer, the CLEC may indicate to Verizon to move all associated directory listings as is. This keeps the CLEC from having to restate the directory listings on the LSR. CLECs indicate this to Verizon by a positive notation on the LSR in the End User Retailing Listings (ERL) field.

### Changing and Deleting Listings

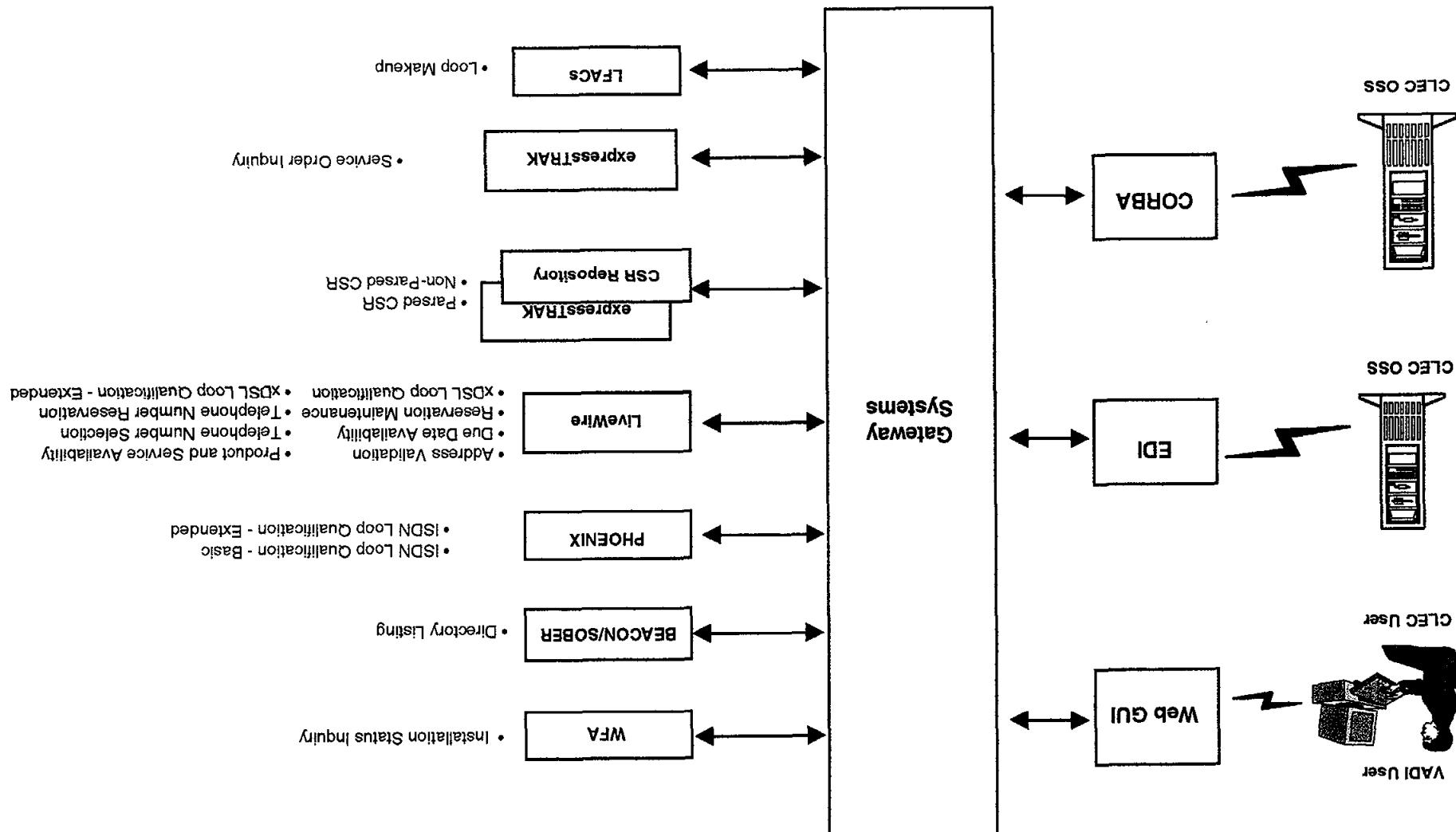
- To ensure that the correct listing is changed or deleted, CLECs must supply the account number and the ALI code for that specific listing when changing or deleting a listing. This applies to listings associated with platform, resale, loops, and full facility based services.
- If a CLEC disconnects a loop or that loop moves to another provider, Verizon does not know what directory listings are associated with that loop. Therefore, the CLEC must notify Verizon which listings need to be deleted.





## Ordering Systems

verizon



## Pre-Ordering Systems

**Verizon**



## ***Listings Verification Process***

Tools and Procedures exist that enable CLECs and Resellers to validate their customers' listings prior to book publication:

- Listing Verification Reports (LVRs)
- Directory Listing Request Pre-Order transaction

**Listing Verification Reports** enable a CLEC to confirm the listing information that is sent to the directory publisher is accurate (i.e. there are no typographical or other errors) prior to publication. These reports include:

- The Degree of Indent (if applicable)
- Type of Listing (e.g. Foreign List, Non-List)
- Name
- Address
- Listed Telephone Number
- Class of Service
- End User Directory Name
- Directory Appearance

The CLEC receives a report for each telephone directory that contains end users of the CLEC.

**Directory Listing Request** enables the CLEC to retrieve existing listing data for a specific end user. If an end user has multiple listings, the system will respond with a list from which the requestor can select a more specific listing and enter a new request.

- Sent to CLECs 30 business days prior to the service order close date for information to be included in the print directory, or upon CLEC request at 90 calendar days prior to the service order close date (for MD, DC, VA, WV, NJ, PA, DE); Sent to CLECs 90 calendar days prior to service order close date for NY/NE.
- CLECs required as a result of LVR review are processed as new, change or delete items, as appropriate, following normal listing order procedures via an LSR. If the listing error was determined to have been a Verizon error, the CLEC contacts the NMC. If it is determined that there is a Verizon error, Verizon takes the corrective action.

#### LVR Process:

## ***Listings Verification Process (LVR)***





## Assistance Available to CLECs

- Verizon provides CLECs with extensive documentation regarding the directory listings product and the procedures for listing their customers in directories. This documentation is available on the Verizon Wholesale web site:  
<http://www22.verizon.com/wholesale/isp/bridge/0,2631,4-lib,FF.html>.

- The specific documents with directory listing information include:

Resale & CLEC Handbooks

Business Rules

Test Deck Ordering Scenarios that include Directory Listings

Directory Listings - Service Order FIDs

Directory Production Schedule

Classified Yellow Page Headings

Regional NX Reference

New Local Number Portability Localities

Directory Titles / Designations

- CLECs experiencing problems or difficulty with directory listings can contact the Wholesale Customer Care Center or the Customer Inquiry Response Team for assistance and problem resolution.

## **Workshops and Training Sessions**

- 10/16/02 End User session: Director from Wholesale Markets Organization - CLEC Communications met with FiberNet personnel to review the Directory Listings Ordering Process
- 5/22/02 Listing Workshop: Caption Listings Definition - Caption - Components and Regulations, Working with Captions, Business Rules and LSR Process, Ordering Scenarios
- 1/09/02 Ordering Workshop: Foreign Listings Foreign Listings
- 12/12/01 Ordering Workshop: Omit Address Clarification
- 11/7/01 Listing Workshop: Overview of Business Rules & LSR Process Listing Types, Record Types,
- Listing Arrangements, Listing Rules, Caption Listings Required Forms, Pre-Order Transactions, Directory Listings
- 8/15/01 Ordering Workshop: "800 Value" vs. "800 Service" Listings & Avoiding Duplicate Secondary
- Information Resources Advance Listing Orders, Verification Resources, Directory Services Agreements
- 7/11/01 Ordering Workshop: Standardize Directory Listings, Track equivalent CSR FIDs for Main and Additional Listings, & Guidelines for ordering directors (books)
- 6/13/01 Ordering Workshop: Main and Additional Main Listings & Secondary Listing Treatment
- 5/9/01 Ordering Workshop: Main and Additional Main Listings & Listed Name & Directory Address Errors
- 4/11/01 Ordering Workshop: Process used to scope Directory Listings & Process facility-based CLECs use to provide NPA NXX and exchange for listings
- 3/14/01 Ordering Workshop: Clarify the Directory Listing CRs #104, #142, and #1903 & Request for an address to be omitted from Directory Assistance and published directives
- 2/14/01 Ordering Workshop: Directory Listings and Livewire, Standardize Listings, Loop Standardize Listings, & NEW LML on Form DL required for UNE partial conversion requests
- 1/10/01 Ordering Workshop: Post-migration disconnect or change of a Standalone Listing & Guidelines when using the EU form "ERL" field.



State	Metric						
		August	September	October	November	December	January
Virginia	OR-6-04: Standard	Result Observations					
	OR-6-04: Other	98.79%*	96.15%	97.10%	97.41%	98.08%	98.45%
D.C.	OR-6-04*	414	467	414	580	520	386
	OR-6-04: Other	98.79%*	96.67%	96.67%	95.83%	95.33%	95.63%
Maryland	OR-6-04: Standard						
	OR-6-04: Other						

\* Includes both Standard and Other activity

This metric will be implemented in West Virginia starting with the January 2003 performance data.

Virginia and 95% complete without Verizon errors in Maryland and D.C.

The number of orders sampled for Directory Listings minus orders with errors is divided by the number of orders sampled to get to the percentage of accurate orders. The standard is 98% complete without Verizon errors in

To calculate this measure, a statistically valid random sample of Directory Listings Orders is gathered each month.

### Directory Listing Order Accuracy Metric -- OR-6-04

## Product Information



## Product Information

### LVR Participation - Virginia

VA Directory	Service Order	CLEC	2001	2002	CLEC	Service Order	VA Directory
Loudoun-Fauquier	1/4/02	None	0	0	Dickenson-Russell	6/21/02	None
Counties	1/4/02	None	0	0	Counties	6/21/02	None
Lee-Wise Counties	1/11/02	NTLOS	123	143	Winchester	8/9/02	NTLOS
Roanoke	1/11/02	NTLOS	123	143	Accomack - Northam	8/30/02	Connectiv
Bedford	1/18/02	None	0	0	Richmond	9/13/02	Cavalier
Lovingston	2/22/02	None	0	0	Montgomery County	9/20/02	None
Gilles County	4/5/02	None	0	0	Pulaski-Dublin Counties	10/4/02	None
Piedmont Area	4/12/02	None	0	0	Peninsula	10/18/02	Cavalier
South Hampton Roads	5/17/02	Cavalier	5857	2792	Williamsburg	10/18/02	US LEC
Federicksburg	5/24/02	US LEC	0	96	Northern Virginia	11/21/02	Cavalier
Staunton	5/31/02	NTLOS	143	77	Danville	6/7/02	None
Petersburg	6/14/02	Cavalier	153	198	Danville	6/7/02	None

## Product Information

### LVR Participation - West Virginia

WV Director	Service Order	CLEC	2001	2002
WHEELING	Service Order Close	Fibermet	36	0
MARINISBURG-BERKELEY	1/11/02	None	0	0
HUNTINGTON	1/18/02	Fibermet	61	0
KANAWHA-PUTNAM	2/1/02	Comscape	134	147
COUNTIES		NTELOS	142	0
MADISON	6/28/02	Fibermet	3	0
FALMOUTH-GRAFTON	7/12/02	Fibermet	9	0
BROOKE-HANCOCK	8/9/02	None	0	0
COUNTIES		NTELOS	0	38
SUTTON	2/22/02	None	0	0
RAINIERE	3/15/02	None	0	0
WILLIAMSON	3/15/02	None	0	0
LAEGGER-MULLENS	3/22/02	None	0	0
KRINGWOOD	3/22/02	None	0	0
CLARKSBURG	4/19/02	None	0	0
LOGAN	5/10/02	None	0	0
BUCKHANNON-WESTON	5/10/02	None	0	0
KEYSER	5/17/02	None	0	0
NEW MARTINSVILLE	10/18/02	Fibermet	17	0
LEWISBURG-UNION-WHITE	11/22/02	Fibermet	0	17
SULPHUR SPRINGS				
RAVENSWOOD-RIPLEY	11/22/02	Fibermet	1	5
SPENCER				



## Product Information

### LVR Participation - Maryland

MD Director	Service	CLEC	2001	2002	MD Director	Service	CLEC	2001	2002
Allegany	1/1/02	None	0	0	Laurel	7/12/02	Cavaller	4	0
Annapolis	1/25/02	None	0	0	Maryland Suburban	7/19/02	Cavaller	4	0
Calvert County	1/25/02	None	0	0	Montgomery Co	7/19/02	Cavaller	66	0
Counties	3/1/02	None	0	0	Prince George Co	7/19/02	Connectiv	25	0
Wicomico County	3/1/02	None	0	0	Baltimore	8/23/02	Connectiv	83	0
Businesses	3/1/02	US LEC	10	0	Prince George Co	7/19/02	Connectiv	25	0
Garrison County	4/19/02	None	0	0	Cecil County & Harford	8/30/02	Connectiv	122	0
Westminster	5/3/02	None	0	0	County	9/27/02	Connectiv	1	0
Dorchester County	5/10/02	None	0	0	Frederick	9/27/02	Connectiv	1	0
Kent-Queen Anne	5/10/02	None	0	0	Charles-St. Mary's	9/27/02	None	0	0
Carroll County	5/10/02	None	0	0	Counties	9/27/02	None	0	0
Washington Co	9/27/02	Connectiv	1	0	Washington Co	9/27/02	Connectiv	1	0

MD Director	Service	CLEC	2001	2002	MD Director	Service	CLEC	2001	2002
Tablet-Caroline Counties	5/10/02	None	0	0	Counties	5/10/02	None	0	0
Kent-Queen Anne	5/10/02	None	0	0	Counties	5/10/02	None	0	0
Dorchester County	5/10/02	None	0	0	Westminster	5/10/02	None	0	0
Garrett County	5/10/02	None	0	0	Garrison County	4/19/02	None	0	0
Businesses	3/1/02	US LEC	10	0	Businesses	3/1/02	US LEC	10	0
Baltimore Businesses-to-	3/1/02	US LEC	10	0	Businesses	3/1/02	US LEC	10	0
Wicomico County	3/1/02	None	0	0	Wicomico County	3/1/02	None	0	0
Counties	3/1/02	None	0	0	Counties	3/1/02	None	0	0
Somerset-Worcester	3/1/02	None	0	0	Somerset-Worcester	3/1/02	None	0	0
Montgomery Co	7/19/02	Cavaller	66	0	Montgomery Co	7/19/02	Cavaller	66	0
Prince George Co	7/19/02	Connectiv	25	0	Prince George Co	7/19/02	Connectiv	25	0
Baltimore	8/23/02	Connectiv	83	0	Baltimore	8/23/02	Connectiv	83	0
Cecil County	8/30/02	Connectiv	122	0	Cecil County	8/30/02	Connectiv	122	0
Frederick	9/27/02	Connectiv	1	0	Frederick	9/27/02	Connectiv	1	0
Charles-St. Mary's	9/27/02	None	0	0	Charles-St. Mary's	9/27/02	None	0	0
Counties	9/27/02	None	0	0	Counties	9/27/02	None	0	0
Washington Co	9/27/02	Connectiv	1	0	Washington Co	9/27/02	Connectiv	1	0

### LVR Participation - Maryland

DC Director	Service	CLEC	2001	2002	DC Director	Service	CLEC	2001	2002
Washington, DC	1/25/02	None	0	0	Washington, DC	1/25/02	None	0	0

### LVR Participation - D.C.

## Production Information

### West Virginia Listing Investigation - Attachment 16 of Joint Declaration of McLean and Webster

- Verizon WV heard the concerns expressed by CLECs during the West Virginia workshops about potentially inaccurate listings being published in WV. Verizon immediately contacted Verizon Information Services (VIS) and held publication of the next four upcoming books, which were Montgomery, Pt. Pleasant, Beckley and Morgantown, while we investigated the issue.
- Verizon focused its efforts on the identification and correction of potentially erroneous listings before publication of books. Verizon consolidated the various lists supplied by FiberNet, removed duplicates and created a list of 101 potentially incorrect listings. Of the 101 FiberNet issues, 58 were in these four books and were the first to be investigated. Verizon also received a list of 17 issues from StratusWave. The StratusWave 17 were all in the Wheeling book, which closed in June and had already been published. Therefore, they could not be fixed before publication of the 2002 directory; however VZ did investigate these issues and the remaining 43 FiberNet issues.
- VZ also proactively pulled another 220 recent UNE LSRs with directory order activity in these four books. Verizon completed a review of potentially impacted listings for the Montgomery, Pt. Pleasant, Beckley and Morgantown books, which collectively contain 11,182 CLEC listings. The results are as follows:

CLEC Listings	Errors Corrected	Ratio of Errors to CLEC Listings
Montgomery	32	0.67%
Pt. Pleasant	13	0.85%
Beckley	35	1.60%
Morgantown	34	1.27%
TOTAL	114	1.02%

- West Virginia Listing Investigation - Attachment 16 of Joint Declaration of McLean and Webster Production Information**
- Verizon identified 114 listings from the FiberNet lists and the proactive pull that required correction and made all 114 corrections before book publication. Of the 114 errors corrected, 66 would have been "severe" errors (0.59% of total listings) as follows: 14 would have affected the spelling of the finding name, 36 would have been omitted, 15 would have been published when the customer had requested non-published, and 1 would have resulted in the incorrect TN being listed. Other errors affected other addresses, designations, appearance, etc. Of the remaining FiberNet issues that affected directors other than these four, Verizon processed corrections for 28. Of the 28, 11 were "severe" errors as follows: 2 were errors in the finding name, 8 would have been omitted, and 1 was an incorrect TN.
  - "Root cause" could not be determined for all the errors requiring correction. For those that could be determined, the top reasons were NMC Reproductive error, followed by LEC system error, then VIS system errors for errors NMC Reproductive error: Rep training and has changed the NMC work routing to direct UNE listing LSRs to a specialized group of representatives; has further automated the checking of LSRs to service orders; and will continue its proactive quality assurance check by a second group outside the NMC until implementation of the OR 6-04 metric.
  - Verizon has taken several corrective actions to address these issues.
    - NMC Rep error: Verizon has re-enforced Rep training and has changed the NMC work routing to direct UNE Listing LSRs to a specialized group of representatives; has further automated the checking of LSRs to service orders; and will continue its proactive quality assurance check by a second group outside the NMC until implementation of the OR 6-04 metric.
    - LEC Systems: Verizon made software corrections to the LEC systems in late September and early October to address the inverted last name/first name business accounts, incorrect punctuation and incorrect handling of the OAD FID which caused street addresses to be omitted.
    - VIS Systems: There was a defect in the VIS system that sometimes caused the incorrect assignment of listing telephone number (LTN), preventing the listing from being placed in the appropriate directory. VIS implemented a system fix in July 2002.



*veri on*

# MD, DC & WV Wholesale Billing

Department of Justice

January 14, 2003

*veri on*

- Standard Process across the former BA footprint
- CLEC receives bills for usage elements, and for recurring and non-recurring charges for services.
  - DUF generated based on usage and transmitted to CLEC in EML format.
  - Billing data available on paper, BDT and for resale on CD ROM
  - Two primary billing systems used in MDVV for wholesale
  - expressTRAK - provides billing for retail products, resale products, UNB-Platform, UNB-ports and UNB-loops
  - Carrier Access Billing System (CABS) - provides billing for access services, transport, and the remaining undelivered elements such as interoffice facilities, shared transport, and collection

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**MD, DC & WV Billing Process**



## *MD, DC & WV Claims Process*

- Standard Process across the former BA footprint
- CLEC submits claims via email or fax
  - Allows attachment of documents
- Acknowledgement returned via email
  - Tracking number assigned
- Resolution
  - Resolution letter sent to CLEC advising how specific claim was resolved, the amount credited, and giving a date range when credits will appear on the bill.

- Vice President was appointed to handle wholesale claims improving claims resolution performance.
- A task force was organized and made recommendations aimed at daily review and tracking of pending claims by Representative & CLEC
- Electronic notification to Service Representative to investigate
- Manager Level Reviews
  - Daily review and tracking of pending claims by Representative & CLEC
  - Allows load balancing
- Weekly Claims Review Meetings
  - Information sharing
  - Concentration on Claim Level Reduction
  - Downward trend reported for number of open claims and dollar amount disputed.

## 2002 Initiatives

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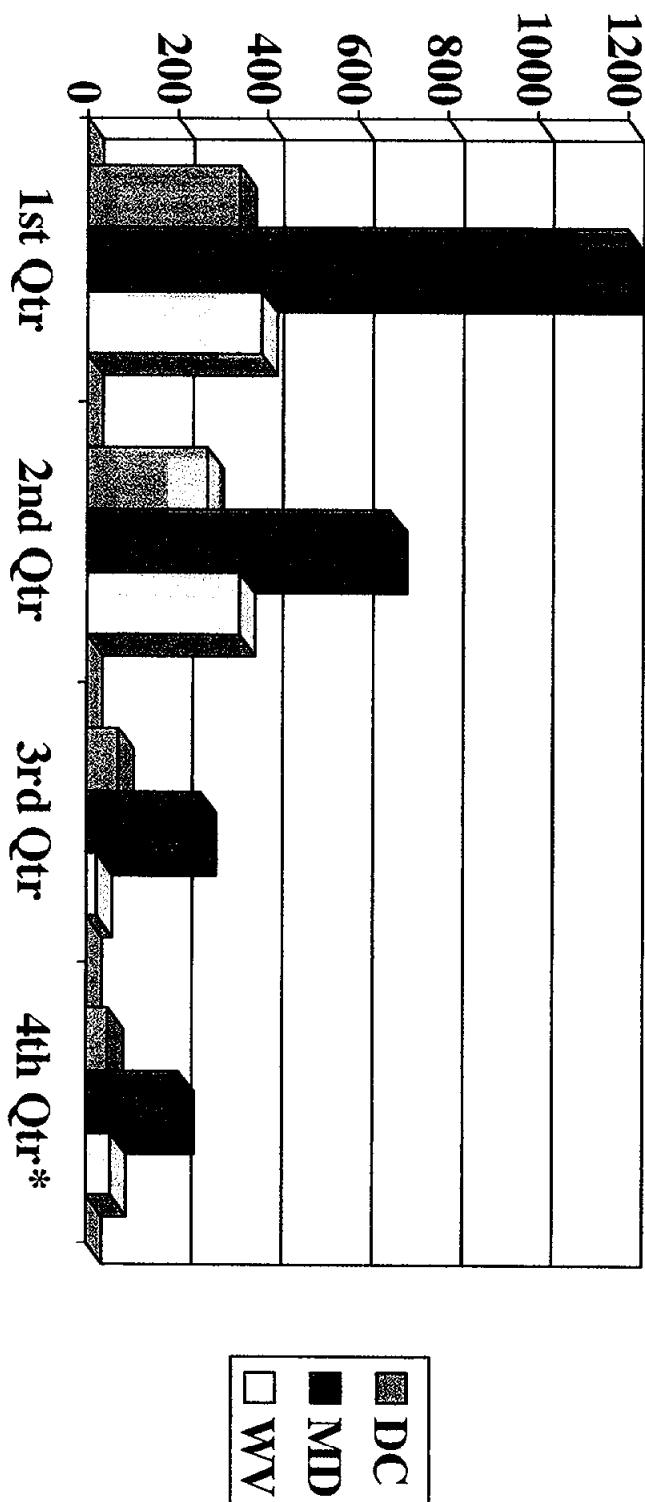
**MD, DC & WV Claims Process**

View on  
the Web

*veri on*

# *Claims Backlog Reduction*

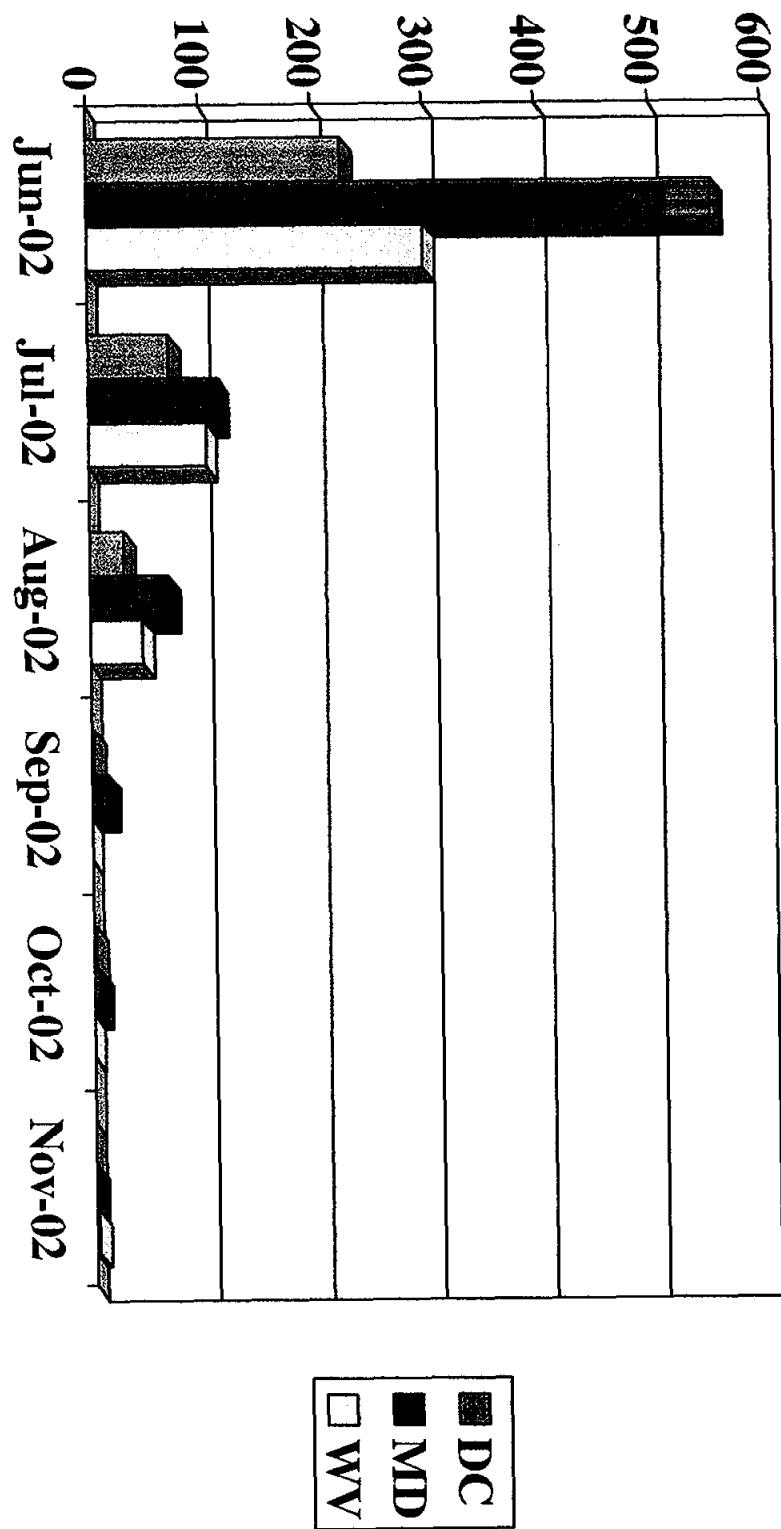
Volume of Pending Claims



\* Through November 2002

# *Claims Older Than 30 Days*

**veri on**



- The BI-3-04 and BI-3-05 metrics on claim handling were adopted in MD, DC, & WV by the respective State Commissions.

## MD, DC & WV Billing Metrics



- Effective Dates
  - MD January 2003
  - DC September 2002
  - WV January 2002
- A special study was conducted using a claim submission cut-off date of March 1, 2002 to measure the effectiveness of claim processing on new claims.

## Claims Acknowledgment Special Study

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BI-3-05	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
WV	100.00%	100.00%	100.00%	100.00%	100.00%	98.26%	100.00%	100.00%	100.00%
DC	100.00%	96.67%	100.00%	97.78%	100.00%	100.00%	100.00%	100.00%	100.00%
MID	100.00%	99.06%	98.68%	95.20%	100.00%	97.98%	100.00%	98.05%	99.56%

## Claims Resolution Special Study

BI-3-04	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
WV	100.00%	98.77%	100.00%	100.00%	100.00%	77.14%	97.14%	100.00%	
DC	100.00%	100.00%	100.00%	100.00%	100.00%	97.53%	84.85%	100.00%	
MID	100.00%	100.00%	99.38%	99.24%	100.00%	100.00%	94.51%	90.6%	99.28%

## Claims Timeliness Metrics



## *Bill Data Tape (BDT)*

- Wholesale Products for which BOS BDT is available:
  - Transport
  - UNE
  - UNE-Platform
  - Resale
  - Listings
- The BOS BDT format offered by Verizon is consistent with industry standards and Telcordia guidelines.

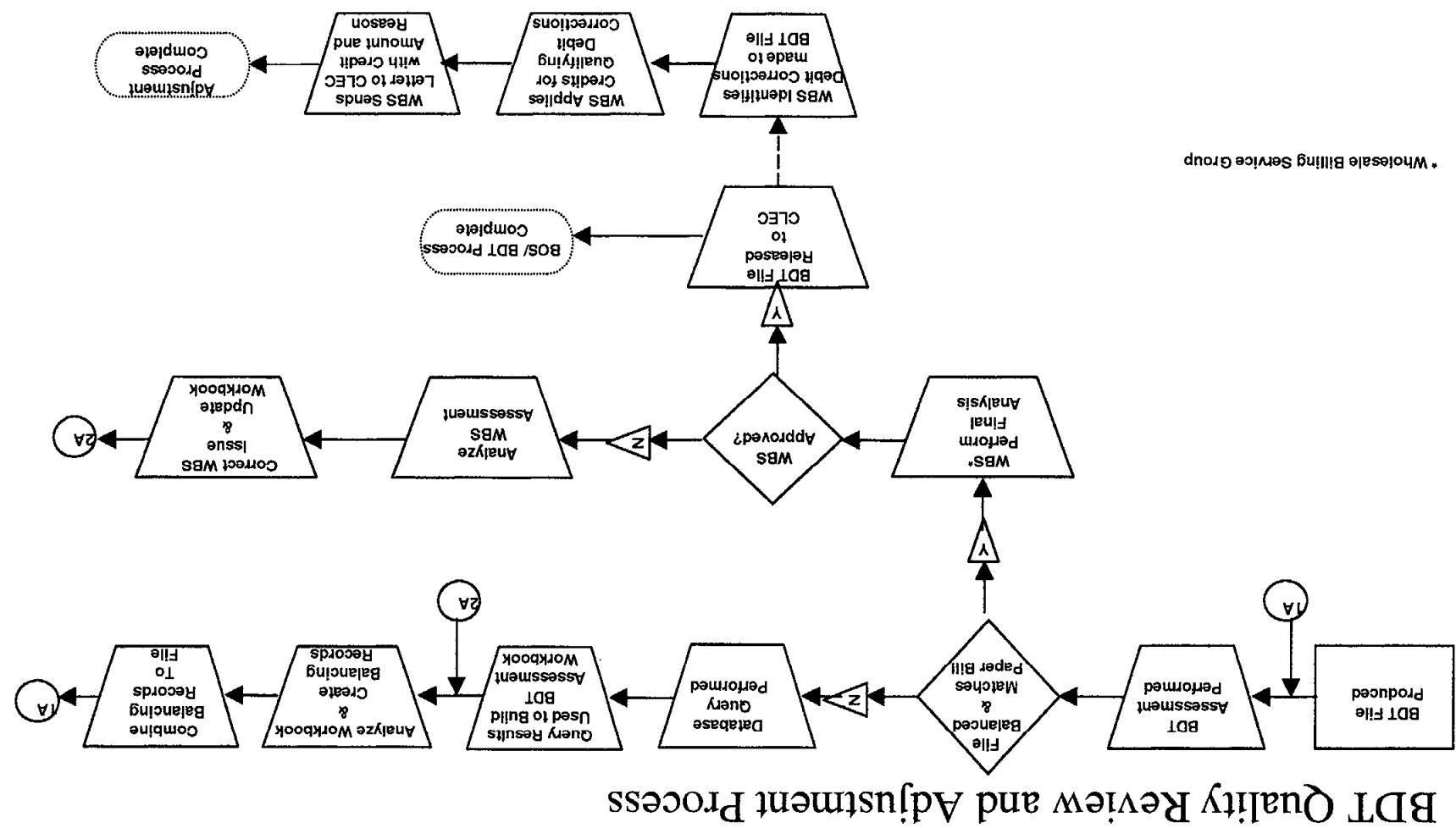
# *Evolution of BOS BDT*

***Verizon***

- BDTs became available in MD, DC & WV to all UNE-Loop CLECs in November of 2001 and Resale and UNE-Platform CLECs in December of 2001.
- The Quality Assurance Process designed to ensure that the BDT and the paper bill are in balance and that the BDT is internally consistent began on 12/1/2001 for WV and on 01/01/02 for DC and MD.
- Verizon made the BDT available to CLECs in MD, DC and WV as the bill of record for bill periods beginning June 1, 2002.

## *BOS BDT - Bill of Record*

- Verizon subjected the BOS BDT to the following quality reviews prior to offering the BDT as the bill of record:
  - Internal quality reviews
  - Independent third party attestation – conducted by PricewaterhouseCoopers.



# BDT Quality Review



## PwC Attestation

- Verizon engaged PwC to conduct separate reviews of the BOS BDT bills for CLECs in MD, DC, & WV to an attestation standard.
- PwC's reviews were similar to reviews it has conducted of Verizon's BOS BDT bills in Pennsylvania and New Jersey and Virginia.
- PwC's examination confirmed that the BOS BDT bill in MD, DC & WV:
  - (1) contains specified summarization points (or detail to derive them) and billing elements also contained on the paper bill;
  - (2) has the same dollar value as the paper bill for those summarization points and billing elements;
  - (3) contains a sufficient level of detail for a third party (such as a CLEC) to recalculate specific billing elements;
  - (4) contains billing records that are internally consistent according to specified criteria;
  - (5) were transmitted in a timely manner; and
  - (6) contained very minimal balancing records which were inserted as part of the quality review process (less than 1%).

As of November, 2002 for MD, DC & WV:

- There are currently 130 CLECs receiving their bills in the BOS BDT format.
- The 130 CLECs receive 264 BDT files each month which have been transmitted within the established time requirements.
- 42 CLECs have elected to have the BDT as their official bill of record.

## BOS BDT Statistics

View on  
[www.bosbdt.com](#)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
MD # BDT Files Sent	39	48	64	71	88	82	86	91	109	125	129
MD Adjustments (%)	.019	.020	.009	.001	.004	.004	.003	.002	.006	.000	.000
DC # BDT Files Sent	26	32	41	43	52	52	54	58	66	81	81
DC Adjustments (%)	.003	.066	.034	.047	.000	.002	.007	.005	.006	.000	.000
WV # BDT Files Sent	13	18	25	27	32	30	34	38	47	54	54
WV Adjustments (%)	.000	.000	.059	.185	.001	.006	.000	.002	.000	.000	.000

Balancing Adjustments required to balance BDT to Paper bill.

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**MD, DC & WV BDT Information**



Paper

SVC

---SERVICE AND FEATURES---

ESTBL:	QTY:	CODE:	DESCRIPTION:	TAX:	AMOUNT:	DATE:
S.O. NUMBER/ ACTVTY						
ASG 2/OCL MASHDINDS1/PIU 100 N8B463837 120102						

Verizon Response: Paper & BDT Examples - Consistent with industry standards, in the CSR section, the OCL (pink) value is presently located immediately after ASG (red) on paper and in the 401505 BDT record. In the OCCG Section, Verizon will populate the OCL Location field in the OCCG 103010 record with the appropriate value in future as requested by AT&T.



AS IS

BDT:

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**Veron**

The OCL Location field in position 130(PINK) of the 103010 record is populated with spaces. The charged amount for the first item of equipment is \$1,759.16 (Blue).

CCZQPHYS COLLO-X-COIN SVC, PER 100 V6  
103021000TPM 2002122220299101700010000000022

The BDT CSR record charges for OCL WASHDCNDS1(PmK) are billed by USOC (Green) identified in 401510 records, with the individual charges following in 40152001 records (Brown) and summed for the entire OCL in the 401525 record (PmK).

4401305000TPM 20021225202Y123456017000100000000014  
20020429 ASG 2/9/1 WASHDCNDTS1/PFU 100/OTID 202407E

0 1  
001015100000TPM 200212252020Y99101701700010000018CC079999987 20020429000012 SP115

4015100000TPM 2002122252029910170001000000018CC079999987 2002042900012 SP115

401525000TPM 20021225202Y9910170001000000021

00000000001700010170202Y99101225200101520010TPM

4015100000TPM 2002122252029910170001000000018CC079999987 2002042900012 SP115

01013100001 PM 2002122520299101700010000000015CC079999987 20020429000012 CCCCZQ

4013100001PM 20021225202299101700010000000015CC0799999987 20020429000012 CCZQ

010150000001 PM 200212232021Y123456017000100000000014 20020429 ACS 2001 WASHDCNDSI/PU 100/OTID 20207E

charges following the 401(k) record (shown) and summed for the entire QCL in the four states (pink).

charges following its 4012001 record (shown) and submitted for the same on

TO BE:

**Verizon**

The OCL Local

ount for the first item of equipment is \$1,759.16 (Blue).

The OCL location field in position 130(PNK) of the 103010 record is populated with an OCL value in response to AT&T's request. The charged amount for the first item of equipment is \$1,759.16 (Billed).

Ventzon will populate the OCL location held in position 130(PINR) of the 103010 record in response to AT&T's request.

TO BE:

BDT CSR:

The record charges for OCL WASHDENDS1 (PmK) are billed by USOC (Gtene) identified in 401510 records, with the individual charges following in 40152001 records (Brown) and summed for the entire OCL in the 401525 record (PmK).

4015100000TPM 20021225202Y9910170001000000018CC079999987 2002042900012 3E115

200201222502Y99101700010000000118CC079999987 20020429000012 SP115  
0 1

CLAIM FORM													
DATE	COMPANY NAME	CONTACT NAME	PHONE	STATE	ACCT MARKET	MASTER BAN / BTN							
					Resale _____ Unbundling _____ Platform _____ TYPE _____ Res _____ Bus _____ Coin _____ (Select One)	Resale _____ Unbundling _____ Platform _____ TYPE _____ Res _____ Bus _____ Coin _____ (Select One)							
CLAIM NUMBER	ACNA	ACNA	ACNA	ACNA	ACNA	ACNA							
VERIZON	VERIZON	VERIZON	VERIZON	VERIZON	VERIZON	VERIZON							
VERIZON WHOLESALE BILLING & COLLECTIONS	VERIZON WHOLESALE BILLING & COLLECTIONS	VERIZON WHOLESALE BILLING & COLLECTIONS	VERIZON WHOLESALE BILLING & COLLECTIONS	VERIZON WHOLESALE BILLING & COLLECTIONS	VERIZON WHOLESALE BILLING & COLLECTIONS	VERIZON WHOLESALE BILLING & COLLECTIONS							
CLAIM REASON	BLK	DA	DISC	DUPB	INB	INQ	LST	PC	NPC	NRES			
TOTAL CLAIM AMOUNT	(Select Any One)												
BTN / RETI	BLK	DA	DISC	DUPB	INB	INQ	LST	PC	NPC	NRES			
Comments	Adj Amount	(VZ Only)	Claim \$ Amount	Invoice Dates	BTN / RETI	(Includes Cuts to Other Cos)							
Total Claim Amt	\$0.00	Total Adl Amnt	\$0.00										
Please see the 'Reason Codes' tab to obtain the additional requirements necessary to process a particular claim type.													

# Verizon Claims Form



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# Verizon Reason Codes

REASON	Reason Code	DESCRIPTION	Additional Requirements
<b>Resale/Unbundling</b>			
Third-party Billing	3PB	Customer is disputing usage from an Interexchange Carrier on the Verizon3 Bill.	> Charges in question
Blocking	BLK	Customer or states they have a block on the account and therefore should not be charged for a specific toll call or charge.	> Blocks in question > Toll calls in question > PON # requesting block to be added
Directory Advertising	DA	Directory Advertising charges are being charged to the Component Account as opposed to be charged to a fictitious account.	
Disconnected Line	DISC	Customer states that the Component Line was disconnected from the Customer.	> PON # requesting disconnect
Duplicate Bills	DUPB	End user is being billed by both Verizon and the Customer.	> Migration Date > PON # requesting migration
Independent Bill	INB	Customer is receiving a separate bill for the specified Component Account.	> Master BAN which component account should be billing to.
Inquiry	INQ	Customer requests a connection to an order but does not request an credit.	
Listing	LIST	The customer is being billed incorrectly for Listings.	
Late Payment Charge	LPC	Customer is disputing the late payment charges which may be as a result of a debit in progress.	
Non Recurring Charge	NRC	Customer disputes a one time charge on his bill.	> Charges disputed
Non-Resellable	NRES	Customer is disputing that a charge for a non-resellable product or service appears on its bill.	> Non-resellable Product/Service on account
Rates	RATES	The rates the customer is being billed do not match the Tariff and/or Interconnection Agreement.	
Recurring Charge	RC	Customer disputes a charge on his bill that recurs monthly.	> Charges disputed
Resale Discount	RSD	Customer is not being provided with the appropriate resale discount.	> Resale discount rate and discount expected
Summary Bill Transfer	SBT	Customer receives a bill with a Summary Bill Transfer amount but is not aware of what component accounts make up the charge. Usually internally created due to a customer request.	> Taxes that should be exempt
Tax	TAX	Customer account is being billed taxes inappropriately.	
Unknown Line	UNK	Customer is not aware of the specified Component Line Usage.	> Rate expected to be billed & why customer believes is being billed incorrect rate
Usage	USG	Customer is being billed incorrect rate for usage related to UNI products.	> Product/USOC requested > PON # requesting product/USOC to be added
Incorrect USOC	USOC	An incorrect USOC was established on the Component Account/Line	

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# Verizon Sample Claim Form

VERIZON WHOLESALE BILLING & COLLECTIONS						
CLAIM FORM						
DATE	10/25/2000					
COMPANY NAME	XYZ Communications					
CONTACT NAME	John Smith					
MASTER BAN/BN#	999-555-1000					
ACCT MARKET	Resale	X	Inbound	Platform	(Select One)	
CLAIM REASON	BLK	X	DA	DISC	DUPB	(Select One)
(Select only one)	RATES	RC	RSD	SBT	TAX	UNK
GRAND CLAIM AMT	\$1,000.00					
BTN/RETN (Indicate reason for claim)	Invoice Date	Claim # Amount	Additional Requirements <sup>1</sup>		Amt Amount	Comments (ex. 200)
201-555-1211	9/30/2000	\$50.00	I had order return call block, but I am still being billed on a per use basis. The block was put on 9/1/00. Psn #1234567890			
201-555-1213	9/30/2000	\$50.00	I had order toll restriction (TID), but am still being billed for long Distance calls. The block was put on 9/5/00. Psn #abcd1234567890			
201-555-1214	9/30/2000	\$40.00	I had order ordered a long distance block, but I am still being billed for Long Distance calls. The block was put on 9/20/00. Psn #1234567890			
Total Claim Amt	\$1,000.00					
	Total Adm Amt \$0.00					

<sup>1</sup> Please see the Reason Codes tab to obtain the additional requirements necessary to process a particular claim type.



# Maryland Billing Metrics

Metric Reported	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
<b>BI-1-02 - % DUF in 4 Bus Days</b> Standard: 95%	98.87	99.28	98.71	98.74	99.29	99.48	99.16	99.64	96.59	99.73	99.73
<b>BI-2-01 – Timeliness of Carrier Bill</b> Standard: 98%	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	99.84	100.00
<b>BI-3-01 – Billing Adjustments</b> % Retail Dollars Adjusted	2.99	3.10	1.62	3.15	3.03	1.88	0.67	3.72	0.99	0.66	1.11
% CLEC Dollars Adjusted	1.00	1.84	1.45	10.08	2.40	2.57	2.56	3.83	0.97	1.21	3.28
<b>BI-3-04 - % CLEC Billing Claims Acknowledged within 2 Business Days</b> Standard: 95%	99.47	100.00	100.00	100.00	99.29	100.00	100.00	100.00	99.61	89.52	99.28
<b>BI-3-05 - % CLEC Billing Claims Resolved within 28 Calendar Days after Acknowledgements</b> Standard: 95%	7.50	4.10	10.92	33.73	42.43	35.74	27.44	81.17	78.70	92.47	99.12

NR:- Metrics were not reported

# DC Billing Metrics

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Metric Reported	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
BI-1-02 - % DUF in 4 Bus Days	99.65	99.64	99.74	99.62	99.76	98.14	98.54	98.03	98.58	99.85	99.82
BI-2-01 - Timeliness of Carrier Bill	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
BI-3-01 - Billing Adjustments	5.13	6.20	1.73	1.55	1.86	12.03	0.84	15.10	NR	NR	NR
BI-3-01 - Billing Adjustments % Retail Dollars Adjusted	5.13	6.20	1.73	1.55	1.86	12.03	0.84	15.10	NR	NR	NR
BI-3-01 - CLBC Billing Claims % CLBC Dollars Adjusted	1.30	32.72	1.02	3.21	8.33	5.31	1.21	0.98	NR	NR	NR
BI-3-04 - % CLBC Billing Claims Business Days	100.00	100.00	100.00	100.00	100.00	100.00	100.00	98.77	84.38	100.00	100.00
BI-3-05 - % CLBC Billing Claims Resolved within 28 Calendar Days after Acknowledged	5.26	0.00	8.29	6.25	52.29	53.13	29.86	52.63	78.67	100.00	100.00

NR:- Metrics were not reported

Standard: 95%

Resolved within 28 Calendar Days after Acknowledged

Standard: 95%

Acknowledged within 2 Business Days

# West Virginia Billing Metrics

Metric Reported	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
BI-1-02 - % DUF in 4 Bus Days Standard: 95%	98.08	97.44	98.73	99.07	99.49	97.18	99.45	99.89	99.79	99.87	99.84
BI-2-01 – Timeliness of Carrier Bill Standard: 98%	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
BI-3-01 – Billing Adjustments % Retail Dollars Adjusted % CLEC Dollars Adjusted	NR										
BI-3-04 - % CLEC Billing Claims Acknowledged within 2 Business Business Days Standard: 95%	100.00	99.01	100.00	98.39	100.00	99.61	100.00	100.00	71.43	95.45	100.00
BI-3-05 - % CLEC Billing Claims Resolved within 28 Calendar Days after Acknowledgements Standard: 95%	17.78	2.00	13.81	21.43	60.56	42.31	58.65	70.14	89.13	100.00	98.18

NR:- Metrics were not reported